

Exhibit 102

Memorandum

October 2, 2017

To: Elizabeth Christian, Regional Water Quality Control Board From: Nicolas
Duffort and Julia King, Anchor QEA, LLC
cc: Mark Sanders, Westpoint Harbor, LLC

Re: Westpoint Harbor Wetland Vegetation Mitigation Monitoring

Introduction

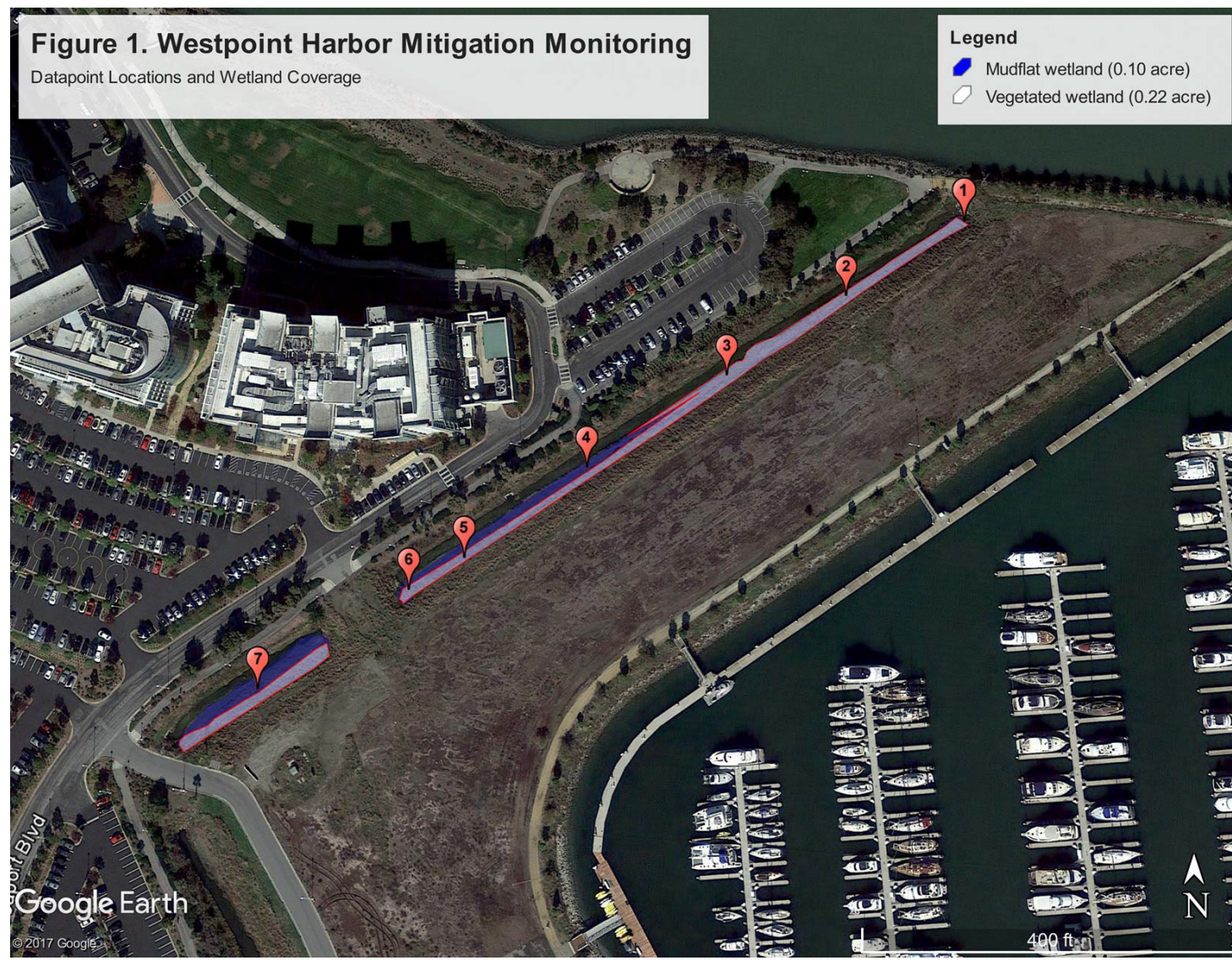
Anchor QEA botanist Julia King conducted vegetation monitoring at the Westpoint Harbor mitigation site along the southeastern bank of a drainage ditch to provide data that substantiates the establishment of tidal marsh habitat on September 14, 2017. Mitigation goals were to attain greater than 0.27 acre of tidal marsh wetland habitat populated with common native salt marsh plant species, and to establish a target hydrological regime that provides a controlled and continuous supply of tidal and fresh water to the mitigation site. These criteria were outlined in the August 1, 2003, *Mitigation and Monitoring Plan* submitted to the U.S. Army Corps of Engineers (USACE) by Radford (Skid) Hall, Ph.D.

Findings

Tidal Marsh Wetland

Seven datapoints were recorded from east to west from the easternmost culvert to the San Francisco Bay (Figure 1; Attachment 1 Photographs 3 through 9). Vegetation was assessed to determine the dominance of wetland vegetation according to methods from USACE's September 2008 *Interim Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region*. Plant species observed consisted of a combination of native and non-native species. Plants typical of salt marsh within the San Francisco Bay shoreline were observed, including pickleweed (*Salicornia pacifica*, obligate [OBL]), alkali heath (*Frankenia salina*, facultative wetland [FACW]), marsh jaumea (*Jaumea carnosa*, OBL), Mediterranean barley (*Hordeum murinum* var. *gussoneanum*, facultative [FAC]) and sickle grass (*Parapholis strigose*, OBL), which were found below the mean high tide line (MHT). Above MHT, the slope supported non-native grasses, with tall wheat grass (*Elymus ponticus*, UPL) as the dominant species. Italian rye (*Festuca perennis*, FAC) and rip-gut brome (*Bromus diandrus*, UPL) also occurred in much lower numbers. Specific findings for the seven datapoints shown on Figure 1 are presented in the following tables. Note that, due to the potential for vegetation overlap, the cumulative percent coverage may exceed 100%.

Figure 1
Datapoint Locations and Wetland Coverage



Datapoint 1

Species	Indicator Status	Percent Cover
<i>Salicornia pacifica</i>	OBL	80
<i>Frankenia salina</i>	FACW	15
<i>Festuca perennis</i>	FAC	5
<i>Hordeum murinum</i> var. <i>gussoneanum</i>	FAC	5
<i>Bromus diandrus</i>	UPL	5
Total Cover		110

Notes:

FAC: facultative

FACW: facultative wetland

OBL: obligate wetland

UPL: upland

Datapoint 2

Species	Indicator Status	Percent Cover
<i>Salicornia pacifica</i>	OBL	100
<i>Bromus diandrus</i>	UPL	5
Total Cover		105

Notes:

OBL: obligate wetland

UPL: upland

Datapoint 3

Species	Indicator Status	Percent Cover
<i>Salicornia pacifica</i>	UPL	40
<i>Frankenia salina</i>	FACW	30
<i>Parapholis incurva</i>	OBL	20
<i>Hordeum murinum</i> var. <i>gussoneanum</i>	FAC	8
<i>Elymus ponticus</i>	UPL	2
Total Cover		100

Notes:

FAC: facultative

FACW: facultative wetland

OBL: obligate wetland

UPL: upland

Datapoint 4

Bare ground. Vegetation up slope from this location supports *Parapholis incurva* and *Elymus ponticus*. Down slope, toward the water's edge, vegetation consists of *Salicornia pacifica* and *Jaumea carnosa*.

Datapoint 5

Species	Indicator Status	Percent Cover
<i>Salicornia pacifica</i>	OBL	100
<i>Elymus ponticus</i>	UPL	5
<i>Bromus diandrus</i>	UPL	2
Total Cover		107

Notes:

OBL: obligate wetland

UPL: upland

Datapoint 6

Species	Indicator Status	Percent Cover
<i>Salicornia pacifica</i>	OBL	100
<i>Parapholis incurva</i>	OBL	6
<i>Elymus ponticus</i>	UPL	3
Total Cover		109

Notes:

OBL: obligate wetland

UPL: upland

Datapoint 7

Species	Indicator Status	Percent Cover
<i>Salicornia pacifica</i>	OBL	40
<i>Parapholis incurva</i>	OBL	25
<i>Elymus ponticus</i>	UPL	5
<i>Bromus diandrus</i>	UPL	5
<i>Festuca perennis</i>	FAC	2
Total Cover		77

Notes:

FAC: facultative

OBL: obligate wetland

UPL: upland

As noted above, the dominant wetland indicator species throughout the project site was pickleweed. The aerial signature of pickleweed (indicative of vegetated tidal marsh wetland) appears red on aeriels and was used to draw polygons on the map representative of salt marsh vegetation coverage within the restoration area, as shown on Figure 2. Non-vegetated mudflat wetlands were also observed at Datapoint 4, and adjacent to Datapoint 7. These areas were also visible on aeriels, and are also shown on Figure 1.

At Datapoints 1, 2, 3, 5, and 6, percent cover exceeded 100%; this corresponds to a total area of 0.21 acre with 100% or higher coverage (see typical conditions in Attachment 1, Photograph 1). Datapoint 7 contained the sparsest coverage at 77%, over an area of approximately 0.01 acre (see Attachment 1, Photograph 9). Non-vegetated mudflat wetlands occur over an area of 0.10 acre on the southeast bank of the channel (see typical conditions in Attachment 1, Photograph 2). This corresponds to a total wetland area of 0.32 acre (including 0.22 acre of 100+% vegetated salt marsh; 0.01 acre of 77% vegetated salt marsh; and 0.10 acre of unvegetated mudflat) within the restoration area (the southeast bank of the channel).

Hydrological Regime

Hydrologic conditions were evaluated based on observed site conditions. An MHT line was clearly visible within the channel (see Attachment 1, Photographs 1 and 2), and connectivity to the San Francisco Bay to the east was observed (see Figure 1). At the time of the site visit, the channel depth was several inches. Soils beneath MHT are presumed hydric based on this observed hydrology regime.

The channel extends to the west, wrapping around the western side of the Seaport Boulevard office development area, and likely takes on stormwater from local drainage. Ground water likely infiltrates the channel due to the presence of the San Francisco Bay and salt ponds in very near proximity to this location.

Evaluation of Success Criteria

As noted above, the project site includes 0.32 acre of high value wetlands, of which 0.21 acre contains 100+% coverage of wetland vegetation; 0.01 acre contains 77% coverage of wetland vegetation; and 0.10 acre contains un-vegetated mudflats. This exceeds the 5-year success criteria, which requires 0.27 acre of high value wetlands, including a minimum of 75% coverage of wetland vegetation (equal to 0.20 acre of 100% vegetated wetland). Therefore, success criteria for target jurisdictional acreage of wetlands have been achieved.

As observed based on site conditions, the channel is subject to a continuous supply of tidal water (via direct connection to the Bay) and fresh water (via stormwater runoff and groundwater connection). Therefore, success criteria for the target hydrological regime have been achieved.

Attachment 1

Site Photographs

Site Photographs

Photograph 1

View of Typical 100+% Wetland Vegetation Coverage Area in Channel



Photograph 2

View of Typical Unvegetated Mudflat Wetland adjacent to Vegetated Wetland within Channel



Photograph 3
View of Datapoint 1



Photograph 4
View of Datapoint 2



Photograph 5
View of Datapoint 3



Photograph 6
View of Datapoint 4



Photograph 7
View of Datapoint 5



Photograph 8
View of Datapoint 6



Photograph 9
View of Datapoint 7

